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**Subject:** Kinder Morgan Linnton - TPH Fraction Program  
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Hi Eva,

Mike Romeo and I had a conference call today with Kinder Morgan and the CH2M Hill team including the CH2M chemist to discuss options to meet the Portland Harbor C10 – C12 PRG. We only discussed two of the three options we discussed earlier this week with EPA. We discussed using the VPH/EPH method and pursuing a modified method that would be reviewed by EPA but is unlikely to be approved prior to conducting or completing the work. After our conference call with EPA this week, the DEQ team discussed more fully the option of calculating a TPH fraction based on the characterization of the source material. Ultimately we concluded that DEQ is not comfortable making regulatory decisions (e.g., concluding that a remedial action is necessary or not necessary) based on this protocol given the associated uncertainties. One of the major uncertainties that we did not discuss during our conference call with you is the probability for differential partitioning from the source product into the dissolved phase. Meaning the ratios of the carbon fractions are likely different between the product and dissolved phase.

Given the regulatory uncertainty of conducting the proposed transition zone work using an unapproved analytical method, Kinder Morgan opted to use the VPH/EPH method. They did request that DEQ confirm that EPA is OK with them proceeding using the VPH/EPH method with the detection limit above the PRG. Eva, please coordinate directly with Mike Romero on this issue as I am out of the office next week and will be back in on Oct. 31<sup>st</sup>.

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